

- ☐ expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against the defendant.

FREIWALD LAW, P.C.

By:



AARON J. FREIWALD, ESQUIRE
Counsel for Plaintiffs

Date: July 7, 2015

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHAWN JONES, A MINOR, BY AND
THROUGH HIS PARENT AND NATURAL
GUARDIAN, ASHLEY PARKS

Plaintiffs

v.

MAIN LINE HEALTH,
THE LANKENAU HOSPITAL,
JOAN KEEGAN, D.O.,
ARLENE SMALLS, M.D. AND
ADEEB KAHLIFEH, M.D.

Defendants

No.

CERTIFICATE OF MERIT AS TO DEFENDANT ARLENE SMALLS, M.D.

I, Aaron J. Freiwald, Esquire, certify that:

- ☒ an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

- ☒ the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

EXHIBIT

D

- ☐ expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against the defendant.

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ADEEB KAHLIFEH, M.D.

Defendants

No.

CERTIFICATE OF MERIT AS TO DEFENDANT ADEEB KAHLIFEH, M.D.

I, Aaron J. Freiwald, Esquire, certify that:

☒ an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

☒ the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

EXHIBIT

E

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